

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEVEN CHASE,

Defendant.

DOCKET NO. 5:15 CR 15-1

MOTION TO CONTINUE TRIAL DATE

Steven Chase, by and through his counsel of record, Assistant Federal Defender Peter Adolf, respectfully requests that this Court continue the trial date presently scheduled for November 2, 2015 at 10:00 AM. As grounds therefore, it is averred:

1. Mr. Chase is accused of running a website on which child pornography was posted and exchanged among users of the site. Count one of the indictment charges him with participation in a “child exploitation enterprise” in violation of 18 U.S.C. § 2252A(g), a charge carrying a mandatory minimum sentence of 20 years in prison and a maximum of life in prison. Other charges in the indictment include counts of advertising, distributing, and possessing child pornography, with respective statutory ranges of imprisonment of 15 to 30 years, 5 to 20 years, and 0 to 20 years.

2. As detailed in the defense motion for inquiry into status of counsel and to file under seal filed herewith, Mr. Chase has asked to have the undersigned relieved from representing him in this matter and wishes to have new counsel assigned.

3. As the undersigned has previously informed this Court, the undersigned will be out of the district and unavailable next week, the week of October 19 through October 23. Accordingly, the issue of Mr. Chase's representation cannot be resolved sufficiently in advance of trial for him to be prepared for trial during the upcoming trial calendar.

4. Under these circumstances, "the ends of justice served by [granting a continuance] outweigh the best interest of the public and the defendant in a speedy trial." 18 U.S.C. § 3161(h)(7). Mr. Chase hereby waives any speedy trial rights attendant to this motion.

WHEREFORE, Steven Chase respectfully requests a continuance of his trial date.

Respectfully submitted:

s/ Peter Adolf
Peter Adolf
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DATE: October 16, 2015

CERTIFICATE OF SERVICE

I, Peter Adolf, Assistant Federal Defender, hereby certify that I have served a copy of the attached Motion to Continue Trial Date upon the following via electronic filing:

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Respectfully submitted:

s/ Peter Adolf

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